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 8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 LATONIA W. LISTER,

12 Plaintiff,

13 vs.

14 CITY OF LAS VEGAS; DOES I-X,
 inclusive, and ROE ENTITIES I-X,
 inclusive,

15 Defendant.
 16

CASE NO. 2:21-cv-0589-CDS-VCF

**STIPULATION TO EXTEND DUE
DATE FOR JOINT PRETRIAL ORDER**

(First Request)

17 Plaintiff Latonia Lister ("Plaintiff"), through her counsel F. Travis Buchanan, Esq., &
 18 Assoc., PLLC, and Jamon Hicks, Esq. of Douglas / Hicks Law, APC and Defendant City of Las
 19 Vegas ("Defendant"), through its counsel Deputy City Attorney Nechole Garcia, Esq., stipulate
 20 and agree to extend the due date for filing their required Joint Pretrial Order thirty (30) days from
 21 May 25, 2023 (initial due date per the Court's Order, dated April 26, 2023, ECF No. 38).

22 1. The Parties have commenced working on their respective portions of the draft Joint
 23 Pretrial Order.

24 2. On May 23, 2023, the Parties exchanged their respective working drafts, and
 25 discussed their respective completed sections, which included all sections, save except their
 26 respective lists of exhibits, and the three (3) dates in which counsel will be available for trial.

27 3. Due to the voluminous amount of documents that are slated to be disclosed as
 28 exhibits by each side, many of which the Parties believe will overlap and consist of the same

1 disclosed exhibits, the Parties would like more time to work together in order to agree on a Joint
2 Exhibit List, while also identifying and determining which additional documents will not be a part
3 of the proposed Joint Exhibits, and the most efficient manner for each Party to list and provide
4 their respective additional exhibits, along with any objections to such additional proposed exhibits.

5 4. In addition, the parties have agreed to continue to engage in settlement discussions.

6 5. Considering this development, while the Parties have spent significant time
7 working on their respective portions of the proposed Joint Pretrial Order, the Parties need more
8 time to finalize the section pertaining to exhibits and objections thereto.

9 6. Per the Court's April 26, 2023, Order – the Joint Pretrial Order is currently due on
10 May 25, 2023.

11 7. The parties have agreed to enter into this stipulation to extend the due date for
12 completing and filing the Joint Pretrial Order for thirty (30) days to allow the parties to work
13 towards preparation of a Joint Exhibit List, and provide their additional exhibits, along with any
14 objections to such additional proposed exhibits.

15 8. An extension will conserve the parties' respective resources and help better
16 organize and streamline management and use of the voluminous amount of documents that each
17 of the parties may use, should this matter proceed to trial, while also facilitating continued
18 discussions aimed towards possibly resolving this matter.

19 9. The parties agree that on or before Monday June 26, 2023, the parties will submit
20 their required Joint Pretrial Order.¹

21 10. The parties make this request in good faith and not to unduly delay the final
22 disposition of this matter.

23 11. This is the first request of the parties to extend the due date for filing their Joint
24 Pretrial Order.

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¹ 30 days from the current due date May 25, 2023, is June 26, 2023.

12. The parties believe that the requested stay would preserve judicial resources in this matter.

Dated this 24th day of May 2023.

F. TRAVIS BUCHANAN, ESQ. &
ASSOCIATES, PLLC

CITY OF LAS VEGAS

/s/ F. Travis Buchanan

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/s/ Nechole Garcia

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ORDER

IT IS SO ORDERED:



United States ~~District Court~~/Magistrate Judge

Dated: 5-31-2023
